

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Lynn H. Stonerod  
**Debtor 1**

M&T Bank  
**Movant(s)**

v.

Lynn H. Stonerod

**Respondent(s)**

Charles J. DeHart, III, Esquire

Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:19-BK-04392-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 30

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Lynn H. Stonerod, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
8. Paragraph 8 contains a conclusion of law to which no response is required.
9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 9; therefore, they are denied.
10. Paragraph 10 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Dated: June 25, 2020

/s/ Paul D. Murphy-Ahles

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Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, June 25, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

James Warmbrodt, Esquire  
KML Law Group, PC  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
*Counsel for Movant(s)*

Charles J. DeHart, III, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

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Kathryn S. Greene, Pa.C.P., Paralegal for  
Paul D. Murphy-Ahles, Esquire